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JUN 12 2015

Justice Court

IN THE JUSTICE COURT OF THE STATE OF MONTANA,
IN AND FOR THE COUNTY OF MISSOULA
BEFORE Karen A. Orzech, JUSTICE OF THE PEACE

STATE OF MONTANA

Plaintiff,

-VS-

ANDREW KNUTSON

Defendant,

Dept No. ²

Cause No. CR-2015-518

COMPLAINT

SUZY BOYLAN, Assistant Chief Criminal County Attorney, deposes and says that on or about the 6th day of April, 2015, in Missoula County, the Defendant committed the offense of COUNT I: SEXUAL INTERCOURSE WITHOUT CONSENT, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-503, punishable by not less than 2-4 years or more than 100 years or life MSP and \$50,000 fine.

The facts constituting the offense are:

COUNT I: On or about the 6th day of April, 2015, the above-named Defendant knowingly had sexual intercourse with Jane Doe without consent. The victim is less than 16 years old.

DATED this 12th day of June, 2015.



SUZY BOYLAN

Assistant Chief Criminal County Attorney

Subscribed and sworn to before me this ____ day of June, 2015.

JUSTICE OF THE PEACE

COMPLAINT 15-1295/BOB FRANKE, Missoula City Police Dept

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Justice Court

1 IN THE JUSTICE COURT OF THE STATE OF MONTANA,
2 IN AND FOR THE COUNTY OF MISSOULA
3 BEFORE Karen A. Orzech, JUSTICE OF THE PEACE

4
5 STATE OF MONTANA,
6 Plaintiff,

Cause No. *CR-2015-518*

7 -vs-

AFFIDAVIT OF PROBABLE CAUSE

8 ANDREW KNUTSON,
9 Defendant.

10
11 STATE OF MONTANA)
12 : ss
13 County of Missoula)

14 SUZY BOYLAN, Assistant Chief Criminal County Attorney, Montana, being first
15 duly sworn upon oath, deposes and says:

16 I have read the official law enforcement reports regarding the investigation of
17 ANDREW KNUTSON for allegedly committing the offense(s) set forth in the complaint and
18 based upon the information contained in the reports, if true, believe probable cause exists
19 to justify charging the above-named defendant as specified in the accompanying
20 complaint.
21

22 On or about the 18th day of May, 2015, the mother of 15 year-old Jane Doe
23 reported to the Missoula City Police Department that the above-named Defendant raped
24 Jane Doe at her home. Jane Doe's mother advised that Defendant asked her if he could
25 date Jane Doe. The mother said no and that it would be inappropriate because
26 Defendant is 19. A short time later, the mother noticed some behavioral changes in her
27 daughter and suspected something had happened. She found a journal belonging to
28


1 Defendant that appeared to confirm her suspicions. When she asked Jane Doe about it,
2 Jane Doe reported the Defendant had sex with her.

3 Jane Doe reported that she initially resisted Defendant's advances but then gave
4 in. In an interview at First Step, Jane Doe stated Defendant penetrated her vagina with
5 his penis and his tongue. Afterwards, she felt dirty and took a shower, spending about
6 an hour in the shower and using half a bottle of body wash to feel clean. She said
7 Defendant knew she was 15 because he was at her 15th birthday party. She described
8 becoming withdrawn and having thoughts of harming herself after the rape.
9

10
11 On or about June 11, 2015, Detective Bob Franke received information that
12 Defendant was at City Hall, where a hearing was scheduled for an Order of Protection
13 against him obtained by Jane Doe's mother. Defendant agreed to an interview with
14 Detective Franke.

15
16 Defendant initially denied raping Jane Doe and said the relationship never went
17 beyond kissing. He said Jane Doe asked him if they could go out. Defendant told her it
18 wasn't a good idea because Jane Doe's mother probably wouldn't let her go out with
19 him because he is 19. Defendant eventually admitted he penetrated Jane Doe's vagina
20 with his penis and tongue.
21

22 Investigation is continuing into possible additional charges involving another
23 underage victim.

24
25 
26 SUZY BOYLAN
27 Assistant Chief Criminal County Attorney
28

1 SUBSCRIBED AND SWORN TO before me this ____ day of June, 2015.

2
3
4 JUSTICE OF THE PEACE

5 ORDER

6
7 Upon reading the foregoing Affidavit, the Court finds that there is probable cause to
8 believe the above-named Defendant committed the crimes charged.
9

10 DATED this ____ day of _____, 2015 at ____ a.m./p.m.

11
12
13 JUSTICE OF THE PEACE